

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: **08/01/2022**

CROSSBORDER SOLUTIONS, INC. and CROSS  
BORDER TRANSACTIONS, LLC d/b/a  
CROSSBORDER SOLUTIONS,

Plaintiffs,

-against-

MACIAS, GINI & O'CONNELL, LLP and SANJAY  
AGARWAL

Defendants.

Case No. 20-cv-4877(NSR)(JCM)

**NOTICE OF MOTION TO  
CONFIRM ARBITRATION  
AWARD**

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law, together with the Declaration of Kenneth W. Taber, *Esq.* and the exhibits attached thereto, Plaintiffs CrossBorder Solutions, Inc. and Cross Border Transactions, LLC *d/b/a* CrossBorder Solutions (together, "CrossBorder"), by undersigned counsel, will move before the United States District Court for the Southern District of New York, Honorable Nelson S. Román presiding, at the United States Courthouse, 300 Quarropas Street, White Plains, New York, 10601-4150, at a time and date convenient for the Court, for an Order confirming the arbitration award dated July 30, 2021 regarding CrossBorder's claims against former Defendants Liga Hoy and Jiaxin "Claire" Song.

Respectfully submitted,

Dated: July 30, 2022

**PILLSBURY WINTHROP SHAW  
PITTMAN LLP**

By: /s/ Kenneth W. Taber  
Kenneth W. Taber  
Brian L. Beckerman

MEMO ENDORSED

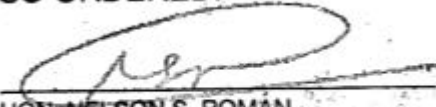
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Transactions, LLC d/b/a CrossBorder  
Solutions*

**The Court DENIES Plaintiffs' motion without  
prejudice for failure to follow my Individual  
Practices. See Sec. 3.A.ii.**

**The Clerk of the Court is directed to  
terminate the motion on ECF No. 177.**

**Dated: August 1, 2022  
White Plains, NY**

SO ORDERED:  
  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE